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VIA ECF

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The Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Moshe Rosenfeld, 23 Cr. 00065 (CM)

Dear Judge McMahon:

We are writing the Court, with the consent of the Government, through Assistant United States Attorney Emily Deininger, to respectfully request an additional 30-day adjournment to the motions briefing schedule previously set by the Court. Under the current schedule, defense motions are due on July 31, with the Government's opposition due on August 31, the defense reply due on September 21, and a conference or hearing on this matter to be held on October 18 at 10 a.m.

While the Government has provided voluminous discovery to date, there are materials outstanding relating to phones seized from Mr. Rosenfeld and his co-defendant. The Government has advised that it is resolving some technical issues related to the provision of these materials, and intends to provide them shortly. Accordingly, the defense submits that it would be most efficient for all to allow time for the Government to produce these materials before filing its motions – which, we currently anticipate, will relate in part to the search and seizure of cell phones.

Accordingly, we are respectfully requesting that the defense be allowed until August 31 to file its motions, with the Government's opposition to be submitted on or before September 30, the defense reply due on or before October 21, and a conference or hearing to be schedule shortly thereafter at the Court's convenience. AUSA Deininger has no objection to this adjournment, and the defense consents to the exclusion of time under the Speedy Trial Act until the date of any rescheduled conference or hearing set by the Court, to allow both the production and review of discovery and the filing of motions.

Sincerely,

COZEN O'CONNOR

SKRISOFF

BY: SARAH KRISOFF

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MEMO ENDORSED

7/20/23

The proposed revised briefing schedule is acceptable to the Court. The matter is Adj. to November 10, 2023, at 2 PM — time is exclude through Nov. 10, for the adjudication

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of status and in the interest of justice.

Colleen McMahon